



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

N62578.AR.000429
NCBC DAVISVILLE
5090.3a

April 18, 1995

Mr. Robert Krivinskas
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1823 - Mail Stop 82
Lester, PA 19113-2090

Re: EPA Comments on the Draft Proposed Plan for Site 9, dated 3-17-95, at the former Naval Construction Battalion Center, RI

Dear Mr. Krivinskas:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency's (EPA) has reviewed the above referenced document. Comments are attached.

In order to speed up the review process, please fax me redlined pages for our quick review of the wording changes. EPA expects the Navy to provide a final PRAP for our quick review before the PRAP is issued to the public.

Overall the plan contains enough information for the general public to understand the Navy's proposed remedial action, however, it is wordy and long. EPA New England suggests a new "Fact Sheet" format, such as the examples I have previously forwarded to you, be sent to the mailing list. The longer format, such as the above referenced plan, could be made available to the public upon request and at the informational meeting and at the public hearing.

The EPA will concur with most of the components of the proposed cap except for the seaward component. We request the Navy be flexible in design of the seaward stabilization component, the height of the sheet pile wall, which should be determined during the public comment period.

Please call me at (617) 573-5736, to arrange a meeting to discuss the seaward stabilization component of the cap and the schedule for release of the final proposed plan and the date of the public hearing for this site.

Sincerely,

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section



cc: Judy Graham, RIDEM
Lou Fayan, NCBC
Bill Brandon, EPA
Kristen Conroy, EPA
Bob DiBiccaro, EPA
Paul Marchessault, EPA
Jayne Michaud, EPA

EPA Comments on Draft PRAP for Site 09

General Comment:

EPA is reserving its comments on the seaward stabilization component until such time as this issue is resolved between the Navy and the RIDEM and the EPA. Therefore, EPA is not making specific comments on which of the seaward stabilization components of Alternatives 2 or 3 is the more appropriate approach.

Specific Comments:

1. Page 1, paragraph 2; Please add "upgradient" to glossary.
2. Page 1, third paragraph; the FFS must be final before the PRAP is issued to the public, therefore, rewrite the first sentence to read, "...remedial alternatives that have been evaluated for the **Source Control Operable Unit** in the Remedial ..."
3. Page 3, third paragraph; this paragraph should be placed closer to the front of the plan to capture the reader's attention, however, the proposed alternative should be changed in accordance with the general comment.
4. Page 3, third paragraph, 2nd to the last sentence; existing fencing will only limit access to Sanford Road, the Navy must limit access to the landfill itself.
5. Pg. 3, p. 3; indicate how deep the slurry wall will be placed in feet below ground and in relationship to the depth of the sheet pile.
6. Page 4; stating "Public Hearing" implies a formal public hearing. Since this is not a formal public hearing we recommend the word "Informal" be inserted before the words "Public Hearing" where ever they occur.
7. Page 5, section 2.4; change "the site" to "this Source Control Unit" in the second sentence.
8. Pg. 7, last para.; To describe the landfill surface as "generally flat" is somewhat of an oversimplification, please clarify the text. The surface contours depicted on Figure 2 indicate quite a bit of relief with a maximum surface elevation of 29.9 feet, considerably higher than the "15 to 20 feet" described in the text.
9. Pg. 8; Please briefly discuss the significance of the "drainage divide" indicated on the figure. Also, please indicate all wetlands surrounding the landfill (e.g. west of Sanford Road), even if the wetlands are not on Navy property. This will give the general public a better understanding of the area.
10. Pg. 9, p. 1; No mention of chlorinated solvents (i.e.; DNAPLs)

in waste materials. This should be included to avoid confusion as the reader encounters this issue in section 3.7.

11. Page 9, second paragraph; comparative results should not be presented in a CERCLA document. Rewrite the last sentence to read, "Results indicated the landfill may be a source of contamination within the harbor."

12. Pg. 10, p. 3; Please clarify if the peat layers have the capacity to act as a perching layer with respect to shallow ground water or as a filter for the seeps. Is the silt unit continuous across the entire site? Does it act as an aquiclude?

13. Page 10, third paragraph; clarify the subsurface geology with the data from the Phase III boring logs.

14. Pg. 10, p.4; Add information as to what the hydraulic properties of the bedrock are.

15. Pg. 10, p. 5; In the context of this discussion of site ground water flow patterns please define what is meant by "upgradient" ground water, as described on page 1.

16. Page 10, fifth paragraph; add the reason why ground water is classified as GB, such as, "due to known or presumed degradation. The goal for GB sites is to restore to GAA when ever possible."

17. Page 10, Section 3.6, second paragraph; clarify that the Phase III will address the Management of Migration OU.

18. Page 11, second paragraph; clarify that additional human health risk assessments (for the fish/shellfish consumption pathway) for the Management of Migration OU will also be conducted in the Phase III RI.

19. Page 11, third paragraph; clarify that the monitoring program will be implemented during the Phase III RI.

20. Page 11, last paragraph; clarify that all the reports are available for review at the Administrative Record also. Add a sentence after the first sentence stating, " This HHRA completed the risk assessment for the Source Control OU."

21. Page 12, last paragraph, second sentence; rewrite the sentence to read, "...evaluation of ecological risks **relating to the Management of Migration OU** are being conducted...". Delete the next sentence.

22. Pg. 13; Clarify what is meant by "upgradient ground water". Clarify how contaminants will be inhibited from migrating in response to tidal fluctuations in ground water levels beneath the landfill/cap.

23. Page 13, section 5.0; rewrite the first sentence to read,

"Based on EPA's presumptive remedy guidance, remedial action..."

24. Page 14, first paragraph first sentence; this section should make the reader aware that this remedy is a presumptive remedy and why it is so. Therefore, rewrite the sentence to read, "...is the result of a evaluation and screening process that meets the requirements of EPA's presumptive remedy guidance." Also add the presumptive remedy definition, revised, as a second paragraph. See comment # 35.

25. Page 14, third paragraph; see general comment.

26. Page 16, figure 4; change the figure as was commented in comment # 54 in the Draft FS: " Pages 4-6 and 4-7 Second Bullet - Geonet drainage layer--Change "Geonet drainage layer" to "Geocomposite drainage layer". The geocomposite drainage layer should be composed of the geotextile bonded to geonet on both sides."

27. Page 17; Clarify how the slurry wall will be keyed into the bedrock.

28. Page 18, paragraph 3; Is settlement of the waste expected? Clarify the text to explain how this will be accommodated. Is this allowed for in the schedule estimates presented on page 25?

29. Pages 22 & 23; since the RIDEM has raised a specific State ARAR issue relating to the seaward component, EPA is reserving comments on the seaward stabilization component until this issue is resolved. See general comment also.

30. Page 26, section 8.8; rewrite the second sentence to read, "As a party to the FFA, the State has reviewed and commented on the RI, FFS and the Proposed Plan, and the ..."

31. Page 27, first full paragraph, last sentence; rewrite to read, "...ground water contamination and/or contaminated sediment..."

32. Page 27, second paragraph; see general comment.

33. Page 27, please add my name, address and telephone number for additional information about this plan.

34. Page 29; DNAPL definition should discuss the significance of density with respect to water.

35. Page 32; Add to the last sentence on the Presumptive Remedy definition: "As the lead agency for the NCBC CERCLA Site, the Navy has chosen to apply this presumptive remedy guidance to the Site 09 Allen Harbor Landfill Source Control OU." See also comment # 24.